

Michael R. Lazerwitz (PRO HAC VICE)
Jeremy J. Calsyn (State Bar No. 205062)
Lee F. Berger (State Bar No. 222756)
CLEARY GOTTlieb STEEN & HAMILTON LLP
2000 Pennsylvania Ave., NW
Washington, DC 20006
(202) 974-1500 (Phone)
(202) 974-1999 (Facsimile)
mlazerwitz@cgsh.com

Counsel for Defendants
LG DISPLAY CO., LTD.
LG DISPLAY AMERICA, INC.

Jason C. Murray (State Bar No. 169806)
CROWELL & MORING LLP
515 South Flower Street, 40th Floor
Los Angeles, CA 90071
(213) 443-5582 (Phone)
(213) 662-2690 (Facsimile)
jmurray@crowell.com

Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

This Document Relates to All Cases

CASE NO. M: 07-CV-1827 SI
MDL NO. 1827

**STIPULATION AND
[PROPOSED] ORDER**

The undersigned counsel, on behalf of their respective clients plaintiffs AT&T
Mobility LLC, AT&T Corp., AT&T Services, Inc., Bellsouth Telecommunications, Inc., Pacific Bell
Telephone Company, AT&T Operations, Inc., AT&T DataComm, Inc., and Southwestern Bell
Telephone Company (jointly, "AT&T"), and Motorola, Inc. ("Motorola"), (collectively the "Direct

1 Action Plaintiffs”¹), on the one hand, and defendants AU Optronics Corporation; AU Optronics
 2 Corporation America, Inc; Chi Mei Corporation; Chi Mei Optoelectronics Corporation; Chi Mei
 3 Optoelectronics USA, Inc.; CMO Japan Co., Ltd.; Tatung Company of America, Inc.; LG Display
 4 Co., Ltd.; LG Display America, Inc.; Nexgen Mediatech, Inc.; Nexgen Mediatech USA, Inc.;
 5 Samsung Electronics Co., Ltd.; Samsung Semiconductor, Inc.; Samsung Electronics America, Inc.;
 6 Sharp Corporation; Sharp Electronics Corporation; Toshiba Corporation; Toshiba America
 7 Electronics Components, Inc.; Toshiba Mobile Display Co., Ltd.; Toshiba America Information
 8 Systems, Inc.; Epson Imaging Devices Corporation; Epson Electronics America, Inc., (collectively
 9 the “Defendants”) on the other hand, respectfully request that the following order be entered to set the
 10 timing of the parties’ respective responses, oppositions, and replies with regard to Direct Action
 11 Plaintiffs’ amended complaints.

12 WHEREAS Direct Action Plaintiffs filed amended complaints in the above-captioned
 13 case on January 29, 2010;

14 WHEREAS Direct Action Plaintiffs and Defendants have agreed that an orderly
 15 schedule for the response to the amended complaints would be most efficient for the parties and for
 16 the Court;

17 NOW, THEREFORE, the undersigned counsel, on behalf of their respective clients,
 18 hereby stipulate and agree as follows:

- 19 1. Defendants’ response to the amended complaint shall be due on or before
 20 February 19, 2010.
- 21 2. Direct Action Plaintiffs’ oppositions, if any, shall be due April 9.
- 22 3. Defendants’ replies, if any, shall be due May 10.
- 23 4. Except as set forth above, all Local Rules shall remain in effect with respect to
 24 the briefing on the motions. Entering into this stipulation does not constitute a waiver of any defense
 25 under Federal Rule of Civil Procedure 12.

26
 27 ¹ The term “Direct Actions” means the actions brought by the Direct Action Plaintiffs
 28 transferred to the above-captioned multidistrict litigation.

1 IT IS SO STIPULATED.

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3 Respectfully submitted,

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6 Dated: February 19, 2010

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8 *Counsel for Plaintiffs Motorola, Inc.,*
9 *AT&T Mobility LLC, AT&T Corp., AT&T*
10 *Services, Inc., BellSouth*
11 *Telecommunications, Inc., Pacific Bell*
12 *Telephone Company, AT&T Operations,*
13 *Inc., AT&T DataComm, Inc., and*
14 *Southwestern Bell Telephone Company*

By: 

Jerome A. Murphy (*pro hac vice*)
Jeffrey H. Howard (*pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004
(202) 623-2500 (Phone)
(202) 628-5116 (Facsimile)

Jason C. Murray (State Bar No. 169806)
CROWELL & MORING LLP
515 South Flower St., 40th Floor
Los Angeles, CA 90071
(213) 443-5582 (Phone)
(213) 622-2690 (Facsimile)

R. Bruce Holcomb (*pro hac vice*)
ADAMS HOLCOMB LLP
1875 Eye Street NW
Washington, DC 20006
(202) 580-8822 (Phone)
(202) 580-8821 (Facsimile)

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22 *Counsel for Defendants LG Display Co., Ltd.*
23 *and LG Display America, Inc., And On*
24 *Behalf of All Defendants AU Optronics*
25 *Corporation; AU Optronics Corporation*
26 *America, Inc; Chi Mei Corporation; Chi Mei*
27 *Optoelectronics Corporation; Chi Mei*
28 *Optoelectronics USA, Inc.; CMO Japan Co.,*
Ltd.; Tatung Company of America, Inc.; LG
Display Co., Ltd.; LG Display America, Inc.;
Nexgen Mediatech, Inc.; Nexgen Mediatech
USA, Inc.; Samsung Electronics Co., Ltd.;

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Lee F. Berger (State Bar No. 222756)
CLEARY GOTTLIEB STEEN & HAMILTON
LLP
2000 Pennsylvania Ave., NW
Washington, DC 20006
(202) 974-1500 (Phone)
(202) 974-1999 (Facsimile)

1 *Samsung Semiconductor, Inc.; Samsung*
2 *Electronics America, Inc.; Sharp*
3 *Corporation; Sharp Electronics*
4 *Corporation; Toshiba Corporation; Toshiba*
5 *America Electronics Components, Inc.;*
6 *Toshiba Mobile Display Co., Ltd.; Toshiba*
7 *America Information Systems, Inc.; Epson*
8 *Imaging Devices Corporation; Epson*
9 *Electronics America, Inc.,*

SO ORDERED:



Judge Susan Illston

2/22/10

Date Entered